

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	Crim. No.
	:	
v.	:	
	:	(J.            )
DONALD YORLETS,	:	
Defendant	:	

**INFORMATION**

**The U.S. Attorney Charges:**

**COUNT 1  
(Conspiracy To Defraud The United States)**

**Introduction**

1. At all times pertinent to this Information, the defendant, Donald Yorlets, was a Pennsylvania licensed and United States, Department of Agriculture (USDA) accredited veterinarian doing business as Circle Y Veterinary Services, 4698 York Road, New Oxford, PA.
2. At all times pertinent to this Information, Individual #1 and Individual #2 owned and operated a livestock exporting business in south central Pennsylvania.

## **The US Department of Agriculture**

3. The US Department of Agriculture (USDA) plays a vital role in ensuring the free flow of agricultural trade by keeping U.S. livestock free from pests and diseases. The USDA certifies that millions of agricultural and food products shipped to international markets meet domestic and foreign requirements. This process relies heavily upon the professional services of USDA accredited veterinarians.

## **Bovine Disease Testing**

4. The USDA requires cattle transported in certain interstate and foreign commerce to be tested for certain diseases, including Bovine Tuberculosis, Brucellosis, Bovine Leucosis, and Bovine Viral Diarrhea. Bovine Tuberculosis and Brucellosis are communicable diseases that can be transmitted under certain circumstances to humans.
5. Bovine Tuberculosis is typically screened for by what is known as a Caudal Fold test administered by a USDA accredited veterinarian. The test entails the injection of a tuberculin substance under the

skin of the cow and the veterinarian's checking the animal for a reaction 72 hours later.

6. Brucellosis, Bovine Leucosis and Bovine Viral Diarrhea are typically tested for by submitting a specimen of the animal's blood to an USDA accredited laboratory for analysis. Each specimen of blood must be taken by or under the direct supervision of a USDA accredited veterinarian. Once the veterinarian draws the blood, he places it in a sterile specimen tube and labels it with an identification number for that animal.
7. In Central Pennsylvania the Pennsylvania Department of Agriculture operates a USDA accredited laboratory in Harrisburg, PA for the testing of bovine blood, known as the Pennsylvania Veterinary Laboratory (PVL). Once the testing is complete the PVL provides the submitting veterinarian with a report indicating whether the sample submitted was negative or positive for the disease tested.

### **Certificates of Veterinary Inspection (CVI)**

8. Animals transported in interstate commerce and to Puerto Rico

must be transported with a Certificate of Veterinary Inspection (CVI).  
issued by a USDA accredited veterinarian who must verify that the  
animals tested negative for Bovine Tuberculosis and Brucellosis.

### **International Certificate of Veterinary Inspection (ICVI)**

9. Cattle exported to foreign countries, including Canada, Mexico and Qatar must be transported with an International Certificate of Veterinary Inspection (ICVI) issued by a USDA accredited veterinarian who verifies that each animal was physically examined and tested negative for either Bovine Tuberculosis, Brucellosis or Bovine Leucosis.

### **USDA Endorsement of the ICVI**

10. In the case of the export of an animal to another country, the certifying veterinarian must also submit the ICVI and supporting documents, including the laboratory test results, to a Regional USDA Endorsement Office for review by an Endorsement Officer. If found to be in order, the ICVI is numbered, counter-signed, and embossed with a seal. A copy of the USDA endorsed ICVI must accompany the animals during transport to the foreign country.

### **Antibody Profile Testing and The NVSL Laboratory**

11. Each cow has a unique Antibody Profile in its blood. While it is theoretically possible that two adult cows could have the same antibody profile, the probability of a random match between two or more cows is extremely small.

12. The USDA's National Veterinary Services Laboratory (NVSL) in Ames, Iowa conducts Antibody Profile testing of animal blood. In 2017 and 2018 the Pennsylvania Veterinary Laboratory (PVL) sent hundreds of blood specimens to the NVSL for Antibody Profile testing. The specimens had been submitted to the PVL by the defendant for Bovine Brucellosis, Leucosis, or Bovine Viral Diarrhea testing on behalf of the cattle's exporters, Individuals #1 and #2.

### **The Conspiracy**

13. Between on or about August of 2016 and on or about October of 2019, in the Middle District of Pennsylvania and elsewhere, the defendant,

**DONALD YORLETS,**

did unlawfully combine, agree and conspire with Individuals #1 and #2, and with others, known and unknown, to defraud the United States

Department of Agriculture (USDA), the Pennsylvania Department of Agriculture, and the buyers of cattle sold by Individuals #1 and #2.

The defendant and his conspirators defrauded the victims by submitting hundreds of non-authentic, bovine blood samples to the PVL laboratory for testing and by falsely verifying the animals had been tested for Bovine Tuberculosis, Brucellosis, Bovine Leucosis or Bovine Viral Diarrhea when they had not.

14. The defendant and his conspirators also defrauded the victims by issuing false VCI and IVCI Certificates of Veterinary Inspection for the animals, which IVCI Certificates were submitted to an USDA Endorsement Officer for review and approval. The false Certificates of Veterinary Inspection enabled Individuals #1 and #2 to export the animals to buyers in Mexico, Canada, Qatar, and Puerto Rico.

#### **Overt Acts in Furtherance of The Conspiracy**

15. On numerous and divers occasions the defendant would falsely verify in his Certificates of Veterinary Inspection that cattle intended for sale and transport to Puerto Rico and foreign countries by Individuals #1 and #2 had been tested for Bovine Tuberculosis when, in

fact, no such test had been administered to the animals.

16. On multiple occasions between November of 2016 and April of 2018 Yorlets submitted hundreds of bovine blood specimens to the PVL Laboratory in Harrisburg for Bovine Brucellosis, Leucosis, or Bovine Viral Diarrhea testing. The specimens were submitted by Yorlets on behalf of Individuals #1 and #2, who intended to sell the animals to buyers in Mexico, Canada, Qatar and Puerto Rico.

17. Yorlets did not draw blood from each animal as he was required to do. Instead he drew blood from a small, randomly selected group of animals or animals he knew to be disease free. Yorlets then falsely represented that blood to be the blood drawn from a larger group of animals.

18. After the PVL tested the specimens and provided Yorlets with reports showing the animals were disease free, Yorlets issued false CVIs and false ICVIs for the animals.

19. Yorlets also submitted false ICVI Certificates to a USDA Regional Endorsement Officer for the government's review and approval. Yorlets would then provide copies of the endorsed ICVIs to Individuals

#1 and #2 so they could sell and transport the animals to Mexico, Qatar and Canada.

20. The following chart summarizes Yorlets' false blood sample submissions to the PVL and false Certificates of Veterinary Inspection. The chart also summarizes the findings of the NVSL Laboratory regarding its Antibody Profile testing of Yorlets' blood specimens. Out of 804 specimens tested, the NVSL only found 70 unique Antibody Profiles.


Cattle Certified By Yorlets	PVL Tested For	Certificate Date	Certificate Number	Cattle Exported To	NVSL Antibody Profile Testing Date	Samples Sent to NVSL	Samples Tested By NVSL	Unique Antibody Profiles
120	Brucellosis	11/08/16	1714A00249	Mexico	05/09/17	20	10	1
150	Brucellosis	11/23/16	1714A00617	Mexico	06/23/17	150	54	3
200	Brucellosis	11/28/16	1714A00642	Mexico	06/23/17	200	54	3
180	Brucellosis	11/28/16	1717A00643	Mexico	06/23/17	180	54	2
34	Brucellosis	11/28/16	16PA922644	Puerto Rico	06/23/17	34	27	2
32	Brucellosis	12/05/16	16PA925681	Puerto Rico	05/23/17	32	27	1
60	Brucellosis	12/16/16	1714A00797	Mexico	06/23/17	200	54	2
184	Brucellosis	12/16/16	1714A00798	Mexico	05/09/17	44	27	1
36	Brucellosis	01/13/17	16PA929324	Puerto Rico	05/23/17	36	27	1
200	Brucellosis	09/22/17	1714A03115	Mexico	02/08/18	200	27	11



80	Brucellosis	10/02/17	17-CA-004-00028374	Canada	01/19/18	80	18	1
454	Leucosis	04/30/18	1814A01681 Reissue	Qatar	07/18 – 09/18	500	88	10
1,386	Leucosis, Diarrhea	04/30/18	1814AO1671 Reissue	Qatar	07/18 – 09/18	1,759	<u>337</u>	<u>32</u>
							804	70

All in violation of Title 18, United States Code, Section 371.

DAVID J. FREED  
United States Attorney  
Middle District of Pennsylvania

  
AUSA Kim Douglas Daniel

Date: August 20, 2020